

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

FILED

WJ

MAY 31 P 4:03

U.S. DISTRICT COURT
NORFOLK, VIRGINIA

05 163

Civil Action No. 2:05CV205
(HCM)

FILED

DEC 14 2005

U.S. DISTRICT COURT
DISTRICT OF DELAWARE

Inline Connection Corporation,

Plaintiff,

v.

Verizon Internet Services, Inc., et al.,

Defendants.

CERTAIN DEFENDANT OPERATING TELEPHONE COMPANIES'
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION

Defendants Verizon California Inc., Verizon Florida Inc., Verizon Hawaii Inc. (now Hawaiian Telecom Inc.), Verizon Delaware Inc., Verizon Maryland Inc., Verizon New Jersey Inc., Verizon New York Inc., Verizon Pennsylvania Inc., Verizon Washington, D.C. Inc., Verizon West Virginia Inc., Verizon New England Inc., Verizon North Inc., Verizon Northwest Inc., Verizon West Coast Inc., GTE Southwest Inc. d/b/a Verizon Southwest, and Contel of the South Inc. d/b/a Verizon Mid-States (collectively the "Operating Telephone Company movants" or "OTC movants") hereby move this Court, pursuant to Fed. R. Civ. P. 12(b)(2), to dismiss the claims of plaintiff Inline Connection Corporation ("Inline") for lack of personal jurisdiction.

In support of this Motion, the Operating Telephone Company movants provide the accompanying Memorandum and Declarations.

#18

Respectfully submitted,

By: 

Robert W. McFarland
McGUIRE WOODS LLP
World Trade Center
101 West main Street, Suite 9000
Norfolk, Virginia 23510
Telephone: 757.640.3716
Facsimile: 757.640.3966

Brian C. Riopelle
McGUIRE WOODS LLP
One James Center
901 E. Cary Street
Richmond, Virginia 23219
Telephone: 804.775.1084
Facsimile: 804.698.2150

Andrew G. McBride
John B. Wyss
Kevin P. Anderson
WILEY REIN & FIELDING LLP
1776 K Street NW
Washington, DC 20006
Telephone: 202.719.7000
Facsimile : 202.719.7049

Dated: May 31, 2005

Counsel for Verizon Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 31st of May, 2005, a true copy of the foregoing was sent to plaintiff's counsel, in the manner indicated, upon:

2005 MAY 31 PM 4:03

Michael K. Plimack, Esq.
Heller Ehrman, LLP
333 Bush Street
San Francisco, CA 94104

(served by e-mail and overnight delivery)

DISTRICT COURT
NORFOLK, VIRGINIA

C. Joel Van Over, Esq.
Swidler Berlin LLP
3000 K. Street, NW, #300
Washington, DC 20007 5116

(served by e-mail and overnight delivery)

Stephen E. Noona, Esq.
Kaufman & Canoles, PC
150 West Main Street #2100
Norfolk, VA 23510

(served by hand delivery)



Robert W. McFarland